

## **EXHIBIT 2**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EVELYN CINTRON

Plaintiff,

V.

CITY OF PHILADELPHIA;  
THE PHILADELPHIA POLICE  
ATHLETIC LEAGUE and JOSEPH  
SULLIVAN

## Defendants

: CIVIL ACTION NO.: 19-4078

**NOTICE OF STENOGRAPHIC DEPOSITION OF THE CORPORATE  
REPRESENTATIVE FOR THE CITY OF PHILADELPHIA, INC. – PHILADELPHIA  
POLICE DEPARTMENT**

To: DCS Sharon E. Ulak, Esquire  
City of Philadelphia Law Department  
1515 Arch Street – 17<sup>th</sup> flr.  
Philadelphia, PA 19102  
Attorney for Defendant, City of Philadelphia

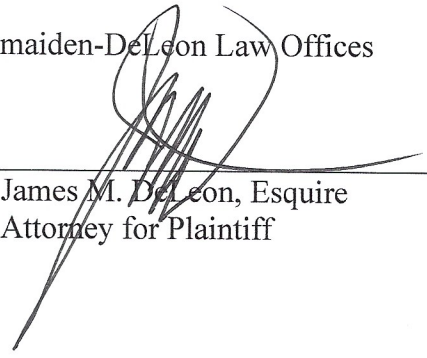
PLEASE TAKE NOTICE that on **Tuesday, October 29, 2024, beginning at 8:30 a.m.**, Plaintiff, Evelyn Cintron, by and through her attorneys, Isaac Green and James DeLeon, pursuant to Federal Rule of Civil Procedure 30(b)(6) will take the oral deposition of the Corporate Designee(s) for Defendant, City of Philadelphia – Philadelphia Police Department, (“PPD”), for use in discovery and at trial, before a Notary Public or before some other officer authorized by law to administer oaths. This deposition will be held at the offices of Magna Legal Services, 1635 Market Street – 8<sup>th</sup> Floor, Philadelphia, PA 19103 and will continue from day to day until completed. The deposition will be recorded via stenographic means in accordance with the applicable rules of Civil Procedure.

Deponent is requested to bring with her/him to the deposition all documents, in hard copy form, as identified in Exhibit “A” attached to this notice, that relate to the instant lawsuit. In lieu of bringing physical documents, the requested documents can be provided to the undersigned

attorney, via email, at [jimmyde46@aol.com](mailto:jimmyde46@aol.com) no later than Tuesday, October 22, 2024 by 5:00 p.m.

The City of Philadelphia – PPD and/or its legal counsel, are advised that you must designate one or more officers, directors, managing agents or other persons with knowledge and ability to testify regarding the topics described in the attached “Exhibit “A” and who will testify on behalf of the corporate entity regarding the matters listed in “Exhibit A” that are known or reasonably available to the City of Philadelphia – PPD.

Rigmaiden-DeLeon Law Offices

By:   
James M. DeLeon, Esquire  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I, James M. DeLeon, Esquire, do hereby certify that on October 19, 2024, a true and correct copy of the foregoing Notice of 30(b)(6) Corporate Designee Deposition was served via electronic mail upon the following:

DCS Sharon Ulak, Esquire  
City of Philadelphia Law Department  
1515 Arch Street – 17<sup>th</sup> Flr.  
Philadelphia, PA 19102  
[sharon.ulak@phila.gov](mailto:sharon.ulak@phila.gov)

Kevin Golden, Esquire  
O'Hagan Meyer  
Three Logan  
1717 Arch St. – Ste. 3910  
Philadelphia, PA 19102  
[kgolden@ohaganmeyer.com](mailto:kgolden@ohaganmeyer.com)

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James M. DeLeon, Esquire

EXHIBIT "A"

1. All written contracts, memoranda, letters, emails and/or notes that set forth or identify the legal, professional and/or business relationship between the Police Athletic League ("PAL") and the Philadelphia Police Department for the time period June 2016 through January 2019.
2. All written contracts, memoranda, letters, emails and/or notes that set forth or identify the legal, professional and/or supervisory relationship between the Philadelphia Police Department and the Commanding Officer of the PAL unit, who is appointed by the Philadelphia Police Department for the time period June 2016 through January 2019.
3. All written contracts, memoranda, letters, emails and/or notes that set forth or identify the legal, professional and/or supervisory relationship between the Philadelphia Police Department and Evelyn Cintron, for the time period June 2016 through January 2019.
4. All written contracts, memoranda, letters, emails and/or notes that set forth or identify the legal, professional and/or supervisory relationship between the Commanding Officer of the PAL and the Police Officer(s) assigned to each PAL site, for the time period June 2016 through January 2019.
5. All Philadelphia Police Department policies and procedures, employee handbooks, emails, memoranda and any other documents provided to Evelyn Cintron pursuant to her employment as the Commanding Officer of the PAL unit during the time that Ms. Cintron was operating as the Commanding Officer under PAL during the time period 2016-2019.
6. All Philadelphia Police Department policies and procedures, employee handbooks, emails, memoranda and any other documents provided to the Police Officers assigned to the PAL sites that governed or in any way related to their duties and responsibilities at the PAL center(s) from June 2016 through January 2019.
7. All Philadelphia Police Department policies and procedures, employee handbooks, emails, memoranda and any other documents provided to the Philadelphia Police Department supervisory staff, including but not limited to the Philadelphia Police Commissioner, all Deputy Police Commissioners and Police Inspectors and Captains, that governed or in any way related to their duties and responsibilities to the PAL center(s) and/or the PAL Commanding Officer from June 2016 through January 2019.
8. All Philadelphia Police Department policies and procedures, employee handbooks, emails, memoranda and any other documents provided to the Philadelphia Police Department employees and/or supervisory staff that governed or in any way related to their duties, responsibilities and/or authority to reprimand and/or discipline Evelyn Cintron based upon her actions/performance as the Commanding Officer of the PAL unit from June 2016 through January 2019.



9. All Philadelphia Police Department meeting notes, minutes, agenda or other written documents generated from meetings related to Evelyn Citron and her position as Commanding Officer of the PAL unit that addressed the department's authority to reprimand and/or discipline Evelyn Cintron based upon her actions/performance as the Commanding Officer of the PAL unit from June 2016 through January 2019.
10. All Philadelphia Police Department policies and procedures, employee handbooks, emails, memoranda and any other documents provided to the Department's employees and/or supervisory staff that governed or in any way related to written and/or verbal communications with Evelyn Cintron while she was working as the Commanding Officer of the PAL unit from June 2016 through January 2019.
11. All documents maintained by the Philadelphia Police Department that are used to prepare the PAL's non-profit IRS Form 990 filings for the time period 2016-2019, including identity of preparer, department personnel responsible for maintaining/updating information used to prepare IRS Form 990.
12. All Philadelphia Police Department policies and procedures maintained and/or implemented by the Department related to possible "whistleblower" situations arising from the operations and/or condition of the PAL sites that existed during the time period 2016-2019.
13. All Philadelphia Police Department policies and procedures maintained and/or implemented by the Department related to possible "whistleblower" situations arising from allegations of police misconduct that existed during the time period 2016-2019.
14. All Philadelphia Police Department policies and procedures, handbooks, police minutes, memoranda and any other documents relied upon by the Commanding Officer of the PAL unit to review and monitor PAL sites maintained at various locations in Philadelphia. Policies and procedures governing reports of damages and unsafe conditions at a PAL site/location that existed during the time period 2016-2019.
15. All Philadelphia Police Department policies and procedures, handbooks, police minutes, and any other documents relied upon by the Department to identify and select locations where PAL sites are situated that existed during the time period 2016-2019.
16. All Philadelphia Police Department policies and procedures, handbooks, investigative reports, minutes and any other documents relied upon by the Department to prepare disciplinary records and/or reports for Evelyn Cintron that existed during the time period 2016-2019.
17. All Philadelphia Police Department Internal Affairs policies and procedures, handbooks, investigative reports, interviews, emails, minutes and any other documents relied upon by the Police's Internal Affairs Department to prepare disciplinary records and/or reports for Evelyn Cintron that existed during the time period 2016-2019.

18. All Philadelphia Police Department policies and procedures, handbooks, memoranda, emails, minutes and any other documents relied upon by the Department to assess the qualifications of a Police Officer who is being considered for placement into the PAL unit that existed during the time period 2016-2019.
19. All Philadelphia Police Department policies and procedures, handbooks, memoranda, emails, minutes and any other documents provided to Police Officers that outlined the procedure to follow to report workplace discrimination that existed during the time period 2016-2019.
20. All Philadelphia Police Department policies and procedures, handbooks, memoranda, emails, minutes and any other documents that identify the chain of command between the Department, the Commanding Officer of the PAL unit and all other Police personnel assigned to the PAL unit and stationed at PAL sites that existed during the time period 2016-2019.